

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DIGITAL MEDIA SOLUTIONS, LLC,)	CASE NO. 1:19-cv-145
)	
Plaintiff,)	JUDGE DAN AARON POLSTER
)	
v.)	MAGISTRATE JUDGE
)	THOMAS M. PARKER
SOUTH UNIVERSITY OF OHIO,)	
LLC, <i>et. al.</i> ,)	
)	
Defendants.)	

SUPPLEMENT TO MOTION TO APPROVE SETTLEMENT AGREEMENT

Mark E. Dottore, Receiver of the Receivership Entities (the "Receiver"), hereby supplements his Motion to Approve Settlement Agreement (Doc. 82). Previously, the Receiver moved this Court for the entry of an Order approving the Settlement Agreement entered into in the case captioned *Mark Dottore, Receiver v. Studio Enterprise Manager, LLC, et al.*, Case No. 1:19-cv-380. On March 1, 2019, the Receiver and Studio Enterprise Manager, LLC and Education Principle Foundation executed an amendment to the Settlement Agreement. The Second Amendment to the Settlement Agreement is attached as Exhibit A.

The amendment was necessary in order to allow DCEH to move to convey assets of Argosy to interested third parties (waiving Studio's right of first refusal in those cases) and to make clear that any sale of the Shared IT assets is subject to the liens and consent rights of Dream Center Education Holdings, LLC's secured creditor and that the Receiver is required to file a motion with the court seeking

approval of any such sale. Except as otherwise set forth in the amendment, the terms and conditions of the Settlement Agreement remain in force and effect.

Dated: March 7, 2019

Respectfully submitted,

/s/ Robert T. Glickman

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CERTIFICATE OF SERVICE

The foregoing was electronically filed this 7th day of March, 2019. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Robert T. Glickman

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